

Safety Evaluation Number¹: SE-W375-99-00013 Revision No: 0

ABCN Number: ABCN-W375-99-00059

Safety Evaluation Subject: Modification of SRD Criteria 4.5, Fire Protection (ISMP References)

PART I: DESCRIPTION OF THE PROPOSED REVISION, BACKGROUND, AND SCHEDULE

1. Describe the proposed revision (including credible failure modes, if applicable).

Revise Safety Requirements Document (SRD) Criteria 4.5 – 8, – 15, –16, – 17, – 18, – 20, – 21, – 22, and – 23 to remove reference to the Integrated Safety Management Plan (ISMP) Sections described in these criteria as an implementing standard for fire protection considerations, relying instead on the other specified standards to provide implementation guidance.

2. Identify the affected Authorization Basis (AB) documents and perform a comparison and assessment of the revision against the AB.

The Safety Requirements Document (BNFL-5193-SRD-01) is the authorization basis document impacted by this change. The ISMP implementing standard citations for fire protection in the SRD Safety Criteria 4.5 – 8, – 15, –16, – 17, – 18, – 20, – 21, – 22, and – 23 are being deleted and the remaining, cited standards are being relied upon to provide equivalent guidance for fire protection considerations.

Attachment 1 is a comparison of the deleted ISMP sections with the other existing referenced standards demonstrating this change as merely a deletion of references to redundant information for each affected SRD criterion, thereby *not* reducing the requirements. No actual requirements are added or deleted.

Based on the above discussion, it is concluded that the change is only a deletion of unnecessary ISMP references from the selected SRD criteria. As such, this SRD change does not:

- modify the requirements of the implementing standards as identified in the SRD
- represent a reduction in commitment contained in the authorization basis, or
- represent a reduction in the effectiveness of any program, plan or procedure contained in the authorization basis.

3. List the references used for the safety evaluation.

- DOE/RL-96-0006, Revision 1, Top-Level Radiological, Nuclear, And Process Safety Standards And Principles For TWRS Privatization Contractors
- RL/REG-97-13, Revision 5, Regulatory Unit Position on Contractor-Initiated Changes to the Authorization Basis
- BNFL-5193-ISP-01, Revision 4b, TWRS-P Integrated Safety Management Plan
- Commitment List dated September 29, 1999
- DOE/RL-98-20, Rev. 1, DOE Regulatory Unit Evaluation of BNFL Inc. Safety Requirements Document

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4. Describe the planned revision implementation schedule.

The changes to the SRD will be incorporated within 30 days of RU approval of the authorization basis change request. No other changes to procedures or plans have been identified to implement this change request.

PART II: REGULATORY IMPACT OF PROPOSED AB REVISION

The following questions are to be answered as part of the safety evaluation, to determine if the proposed AB revision (and the proposed initiating change if applicable) requires prior RU approval.

- | | <u>YES</u> | <u>NO</u> |
|---|-------------------------------------|--------------------------|
| 1. Does the revision involve the deletion or modification of a standard previously identified or established in the approved SRD? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

JUSTIFICATION:

As discussed above, the change does modify a standard in that it deletes references to information in the ISMP that is redundant to that contained in the other implementing standards for SRD Safety Criteria 4.5 – 8, – 15, – 16, – 17, – 18, – 20, – 21, – 22, and – 23. The requirements contained in the ISMP were redundant and therefore unnecessary for SRD criteria implementation. The Attachment 1 comparison of the referenced ISMP sections with the remaining cited standards demonstrates that there is no reduction in the actual requirements.

- | | | |
|---|--------------------------|-------------------------------------|
| 2. Does the revision result in a reduction in commitment currently described in the AB? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|-------------------------------------|

JUSTIFICATION:

The remaining implementing standards provide equivalent implementing guidance for the affected safety criteria.

The Attachment 1 comparison of the requirements contained within the ISMP shows that the ISMP citations are redundant and unnecessary to provide implementing guidance for fire protection. Also the ISMP itself remains part of the AB. Therefore, the change does not result in a reduction in commitment currently described in the AB.

- | | | |
|---|--------------------------|-------------------------------------|
| 3. Does the revision result in a reduction in the effectiveness of any program, procedure, or plan described in the AB. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|-------------------------------------|

JUSTIFICATION:

As discussed in II.2 above, the changes involve deleting redundant material. Based on this review, it is concluded that the revision does not result in a reduction in the effectiveness of any program, procedure, or plan described in the AB.

Note: Guidance on defining the terms and responding to the above questions is provided in K70C528, Code of Practice for Managing Changes to the Authorization Basis, Appendix 6.

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If all the answers to the above questions are no, then the change can be made without prior RU approval.

If any of the above answers is yes, then RU approval is required prior to implementation of the AB revision (and the initiating change if applicable). An ABAR shall be prepared to obtain RU approval (see K70C528, Appendix 7.)

PART III: SAFETY EVALUATION CONCLUSION

- ☐ All PART II questions are answered No. Therefore, RU approval is NOT required prior to implementing the proposed AB revision (and initiating change where applicable).
- ☒ At least one PART II question is answered Yes. Therefore, RU approval IS required prior to implementing the proposed AB revision (and initiating change where applicable). Issuance of an ABAR is required to obtain RU approval.

Evaluator/Originator

Date

Reviewer²

Date

Radiation Safety and Regulatory Manager

Date

Chair, Project Safety Committee³

Date

RPP-WTP General Manager³

Date

² The reviewer should be a person from the same department as the Evaluator/Originator and at least as qualified as the Evaluator/Originator to conduct safety evaluations.

³ This signature required if Safety Evaluation concludes AB change can be made without RU prior approval. If RU approval (ABAR) is required, PSC and GM signatures occur on the ABAR.